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11 *Attorneys for Defendant Bristol-Myers Squibb Company*

12 [Additional Counsel Listed At Signature Page]

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN FRANCISCO DIVISION

17 JAMES BLAIR *et al.*,

18 Plaintiff,

No. 14-2515 EMC

19 v.

20 BRISTOL-MYERS SQUIBB COMPANY,  
MCKESSON CORPORATION, and  
21 DOES 1 to 100,

**JOINT STIPULATION AND  
~~[PROPOSED]~~ ORDER TO STAY  
LITIGATION PENDING TRANSFER TO  
THE PLAVIX® MDL**

22 Defendants.

Judge: Hon. Edward M. Chen

1        This Joint Stipulation is made by and between Plaintiffs in *Blair et al. v. Bristol-Myers*  
2 *Squibb Co. et al.*, No. CV-14-2515 EMC (N.D. Cal.), and Defendant Bristol-Myers Squibb  
3 Company (“BMS”) (collectively “the Parties”), by and through the undersigned counsel of record,  
4 with reference to the following facts:

5        1.       WHEREAS, on February 12, 2013, the Judicial Panel on Multidistrict Litigation  
6 (“JPML”) established a multidistrict Plavix® litigation in the District of New Jersey, assigned to  
7 Judge Freda Wolfson;

8        2.       WHEREAS, on May 30, 2014, Plaintiffs filed the *Blair* action in the Superior Court  
9 of California, San Francisco County;

10       3.       WHEREAS, on June 2, 2014, the *Blair* action was removed to this Court by  
11 Defendant BMS;

12       4.       WHEREAS, on June 11, 2014, Defendant BMS tagged this case for transfer to the  
13 Plavix® MDL and anticipates that the JPML will issue a conditional transfer order for this case  
14 soon; and

15       5.       WHEREAS, the parties agree that the *Blair* action should be stayed pending its  
16 anticipated transfer to the Plavix® MDL in the District of New Jersey.

17  
18       THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court’s  
19 approval, that the *Blair* action should be stayed pending its anticipated transfer to the Plavix® MDL  
20 in the District of New Jersey.

21  
22       **IT IS SO STIPULATED.**

1  
2 Dated: June 11, 2014

3  
4 Joshua C. Ezrin  
5 AUDET & PARTNERS, LLP  
6 221 Main Street, Suite 1460  
7 San Francisco, CA 94105

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9 Daniel C. Burke  
10 PARKER WAICHMAN LLP  
11 6 Harbor Park Drive  
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13 By: /s/ Joshua C. Ezrin  
14 Joshua C. Ezrin

15  
16 *Attorney for Plaintiffs*

17  
18 Dated: June 11, 2014

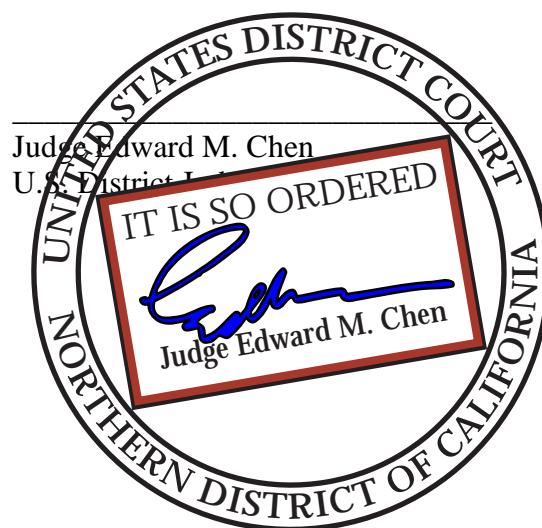
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21 San Francisco, CA 94111

22 By: /s/ Sharon D. Mayo  
23 Sharon D. Mayo

24  
25 *Attorney for Defendant*  
26 *Bristol-Myers Squibb Company*

27  
28 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

29 Date: 6/13/14



1 I, Sharon D. Mayo, am the ECF User whose ID and password are being used to file this  
2 Stipulation and [Proposed] Order to Stay Litigation Pending Transfer to the Plavix® MDL. In  
3 compliance with General Order 45, X.B, I hereby attest that Joshua C. Ezrin has concurred in this  
4 filing.

5  
6 Dated: June 11, 2014

ARNOLD & PORTER LLP

7  
8 By: /s/ Sharon D. Mayo  
9 Sharon D. Mayo

10 *Attorney for Defendant*  
11 *Bristol-Myers Squibb Company*